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June 25, 2013

Ms. Julie Veach  
Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, DC 20554

Re: DA 13-1350 (WC Dkt No 02-60)

Dear Ms. Veach,

The information below is in response to The Wireline Competition Bureau's request for comment on a review request filed by the Arkansas Department of Information Systems (ARDIS) seeking reversal of a decision of the Universal Service Administrative Company (USAC).

In documentation presented by ARDIS it has been found that their existing Contracts with ATT, Centurylink and Windstream valid from February 2, 2007 to January 31, 2012 were in effect at the time of the USAC denial having been extended by mutual agreement to January 31, 2013.

These Contracts reflected a 5 year term with the option by the Office of State Procurement to "Renew said Contracts in accordance with their original terms, upon mutual agreement, for up to two (2) renewal periods, in one (1) year increments or a portion thereof, but not to exceed a total contract term of seven (7) years."

Therefore, USAC's partial funding year denial was apparently premised on the fact that new contracts had been initiated by ARDIS requiring a new funding request be filed for February 1, 2012 to June 31, 2012. This additional funding request was clearly not required. That premise is demonstrated by the fact that in each case the contract extension for each carrier cited the same contract number as the original contract and was within the terms of extension as set forth in the original agreements.

Based on this information it is believed that USAC's partial year funding denial for 2011-2012 should be reversed by order of the FCC Wireline Competition Bureau.

Respectively submitted by,

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